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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

MEGHAN OPBROEK,

Plaintiff,

vs.

CITY OF PORTLAND, a municipal
corporation,

ZACHARY DOMKA, in his individual
capacity,

BRENT TAYLOR, in his individual capacity,

MARK DUARTE, in his individual capacity,
and

ERIK KAMMERER, in his individual capacity,

Defendants.

Case No. 3:22-cv-00610-JR

**DECLARATION OF VIKTORIA LO
IN SUPPORT OF PLAINTIFF'S
RESPONSE TO DEFENDANT CITY
OF PORTLAND'S PARTIAL
MOTION TO DISMISS**

I, Viktoria Lo, declare as follows pursuant to 28 USC § 1746:


1. I am one of the attorneys for plaintiff in this action.
2. I make this declaration to identify exhibits in support of Plaintiffs' Response to City of

Portland's Partial Motion to Dismiss under ORS 30.265(6)(e).

3. Exhibit 1 is a true and correct copy of the Oregon House Judiciary Committee Minutes for HB 1515 (1969) retrieved from the Oregon Secretary of State database. Dec of VL Exhibit 1- Oregon House Judiciary Committee Minutes for HB 1515 (1969).
4. Exhibit 2 is a true and correct copy of the proposed language of HB 1515 (1969) retrieved from the Oregon Secretary of State database. Dec of VL Exhibit 2- Proposed Language of HB 1515 (1969).
5. Exhibits 3 and 4 are true and correct copies of law review articles from the historical time period of the legislature's original enactment of this provision in 1969. Dec of VL Exhibit 3- Washington and Lee Law Review 1971 "Municipal Liability For Riot Damage Under Eminent Domain;" Dec of VL Exhibit 4- Harvard Law Review 1969 "Municipal Liability for Riot Damage."
6. Exhibits 3 and 4 further illuminate the legislator's intent by providing historical context to the passage of this law. These law review articles discuss municipalities across the country passing statutes limiting their liability for property damage caused by "rioting mobs" during civil rights and Vietnam War protests.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 1, 2022



VIKTORIA LO